

**REQUIRED STATEMENT****TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Frederick Burton Case No. 19-13686 Chapter 13

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR HOME EQUITY  
MORTGAGE LOAN ASSET-BACKED TRUST SERIES INABS 2007-A, HOME EQUITY

All Cases: Moving Creditor DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR HOME EQUITY MORTGAGE LOAN ASSET-BACKED TRUST SERIES INABS 2007-A Date Case Filed 5/13/19

Nature of Relief Sought:  Lift Stay  Annul Stay  Other (describe) Co-Debtor Stay

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 08/26/2019

Chapter 7:  No-Asset Report Filed on \_\_\_\_\_  
 No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a.  Home
  - b.  Car Year, Make, and Model \_\_\_\_\_
  - c.  Other (describe) \_\_\_\_\_
2. Balance Owed as of 06/09/2020 \$384,039.80  
Total of all other Liens against Collateral \$0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$375,000.00, per Debtor's Schedules
5. Default
  - a.  Pre-Petition Default as of petition date  
Number of months 15 Amount \$43,447.34
  - b.  Post-Petition Default
    - i.  On direct payments to the moving creditor  
Number of months 7 Amount \$18,106.01
    - ii.  On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_
6. Other Allegations
  - a.  Lack of Adequate Protection § 362(d)(1)
    - i.  No insurance
    - ii.  Taxes unpaid Amount \$ \_\_\_\_\_
    - iii.  Rapidly depreciating asset
    - iv.  Other (describe) \_\_\_\_\_
  - b.  No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
  - c.  Other "Cause" § 362(d)(1)
    - i.  Bad Faith (describe) \_\_\_\_\_
    - ii.  Multiple Filings \_\_\_\_\_
    - iii.  Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i.  Reaffirm
    - ii.  Redeem
    - iii.  Surrender
    - iv.  No Statement of Intention Filed

Date: June 26, 2020 /s/ Karl Meyer  
(Rev. 12/21/09) Counsel for Movant